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August 8, 2017

BY ECF

The Honorable Peggy Kuo
Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Lopez et al. v. Paralia Corp. et al.*
Case No. 1:16-cv-06973-SLT-PK

Dear Judge Kuo:

As Your Honor is aware, this firm represents Defendants Paralia Corporation d/b/a Del Rio Diner, Bensonhurst Rest. Corp. d/b/a Vegas Diner, Theodoros Vlamis, Larry Georgetown, Demetrios "James" Vlamis, And Frank Mavromichalis (collectively, "Defendants"). We submit this joint letter on behalf of all parties to the case, with the consent of Brent Pelton Esq. of Pelton Graham LLC, counsel for Porfirio Lopez, Pedro Candelario Torres, Marino Cuanutencos, Mirym Udy, Ruperto Emigdio, Jose Angel Lopez, Estaban Toshua, and Felipe Cruz (collectively, "Plaintiffs") seeking an 90-day extension of the fact discovery deadline from August 31, 2017 until November 29, 2017. This the parties' first request for an extension of the fact discovery deadline.

Since the parties last appeared before Your Honor, Plaintiffs' FLSA conditional certification motion has been fully briefed. The parties have been working diligently to review and produce documents relevant to this stage of litigation, and are committed to continuing to advance discovery. Because the restaurants where the Plaintiffs worked are no longer in business, it has taken some additional time to gather responsive documents. The parties are in the midst of completing written discovery and expect to take the depositions of the eight named plaintiffs and corporate/individual defendants in September and October. This additional time should suffice to permit the parties to complete all outstanding fact discovery in this matter without requiring an additional extension. In the event that conditional certification is granted and additional individuals join this suit, the parties will work cooperatively to develop a discovery plan for opt-in discovery.

We thank Your Honor in advance for your consideration of this request.



The Honorable Peggy Kuo
August 8, 2017
Page 2

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Howard M. Wexler

Lorie E. Almon
Howard M. Wexler

cc: All counsel of record (via ECF)